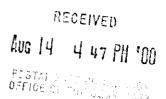
BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001



POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF UNITED PARCEL SERVICE REDIRECTED FROM WITNESS PATELUNAS (UPS/USPS-ST44-1-2)

The United States Postal Service hereby provides its responses to the following interrogatories of United Parcel Service: UPS/USPS-ST44-1-2, filed on July 31, 2000, and redirected from witness Patelunas.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 August 14, 2000

Response of United States Postal Service to Interrogatories of United Parcel Service (Redirected from witness Patelunas, USPS-ST44)

UPS/USPS-ST44-1. Refer to Library Reference USPS-LR-I-429, Table 8.

- (a) Confirm that the final adjustments listed in Table 8 do no appear in the final adjustment column in Library Reference USPS-LR-I-424, Volume G, Table E.
- (b) Provide an explanation as to why these final adjustments are missing.
- (c) If there is an error in Table E, please file a revised Table E.

Response:

(a - c) The cited final adjustments were indeed missing from the "D" Reports of the PRC version. The revised "D" Reports associated with Table E, USPS-LR-I-424, Volumes C, E and G were filed as USPS-LR-I-442 on 8/2/00.

Response of United States Postal Service to Interrogatories of United Parcel Service (Redirected from witness Patelunas, USPS-ST44)

UPS/USPS-ST44-2. Refer to Library Reference USPS-LR-I-424, Volume G, Table E.

- (a) Confirm that the calculations in the contingency column represent a 1% contingency.
- (b) Provide an explanation as to why the contingency is 1% and not 2.5%.

Response:

(a - b) The contingency amounts were incorrectly calculated at 1% in the "D" Reports of the PRC version. The revised "D" Reports with the correct 2.5% contingency are shown in Table E, USPS-LR-I-424, Volumes C, E and G were filed as USPS-LR-I-442 on 8/2/00.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Susan M. Duchek

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2990 Fax –5402 August 14, 2000